

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.
20-cv-04651-SDG

AFFIDAVIT OF ROBIN LOURIE

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, Robin Lourie, who being duly sworn, deposed and stated as follows:

1. My name is Robin Lourie. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I am a resident of and registered elector in DeKalb County, Georgia.

3. On November 14 and 15, 2020, I was present as an observer credentialed by the Democratic Party of Georgia to observe the statewide hand

recount of ballots cast in the 2020 Presidential Election in Fulton County, Georgia (the "Recount").

4. I arrived at the Georgia World Congress Center, where the Recount was held, at approximately 8:00 a.m. on November 14 and 8:20 a.m. on November 15.

5. On arrival on the 14th, the entrance to the recounting area was not marked well and it took some time to find the entrance. This difficulty in finding the space where the recount was happening would have affected everyone attempting to enter equally. Once I found the correct location and provided my credentials, I was given access to the recount area around 8:45 a.m. I saw numerous credentialed Republican and Democratic observers in that area.

6. On November 14, I estimate there were approximately 170 tables with 2 individuals per table engaged in the Recount. To the best of my knowledge, the Recount began with mail-in or absentee ballots.

7. On November 14, there were numerous credentialed observers from both parties observing the recount. Credentialed observers had access to view each of the two-person audit teams. We were asked to social distance, but we were allowed to get within approximately 2-4 feet of the tables. There were aisles in front and behind the rows of tables and we were allowed to walk in front and behind the tables. I was able to hear and observe individuals at the tables read off

the name of the person who received the vote, hand the ballot to their partner to verify, and put the ballot in one of 4-5 piles marked on the table. I observed pieces of paper with Trump, Biden, and Joregensen on them and I saw counters put ballots in the corresponding pile. There were 1-2 additional sheets of paper on the table, but I cannot remember exactly what was written on them. Each table also had 3 large manilla envelopes for placing write-in ballots, and two other categories of ballots. I understood that these were the ballots that needed to be presented to the voter review panels.

8. I further observed that the envelopes for write-in candidates had a piece of paper attached and I saw the workers write the name of the write-in candidate(s) on the outside of the envelope and then place the write-in ballot(s) in the envelope.

9. On November 14, I observed the gold sheets with vote tallies being given to election officials for entry into the system. Each time a box of ballots was completed at a table, the gold sheet and any manilla envelopes that contained ballots were given to the election official with the sealed box of ballots. The workers were not allowed to leave their table until the box, gold sheet, and manilla envelopes were picked up and taken away.

10. On November 14, I heard the election official on the PA asking monitors to maintain social distance and to refrain from moving into the personal

space of the workers counting the votes. I was able to easily observe, hear, and monitor the tables while keeping a respectable distance from the workers. I did notice some credentialed Republican observers being intrusive and speaking to the workers counting the vote.

11. I left on November 14 at approximately 1:15 p.m. as it was the end of my volunteer shift.

12. On November 15, 2020, when I arrived at approximately 8:20 a.m., the tables were full of counters and I noticed that additional tables had been added from the day before. At approximately 9:00 many of the workers were permitted to leave, but there continued to be approximately 30 teams counting votes. I did not hear anyone claiming that the Recount had “just finished” or was otherwise complete. To the contrary, the Recount was ongoing and continued until I left around 12:30.

13. On November 15, 2020, a Fulton County election official announced that all Republican and Democratic monitors should gather in two distinct locations. The official stated that only one monitor should be present for every ten tables. She asked each party to reduce their monitors down to 17. I was one of the 17 credentialed monitors to stay and observe for the Democratic Party. Because there were too many Democratic monitors, some of those that were not needed left. The Republican Party was also allowed to have 17 credentialed monitors. Officials

did announce that any additional monitors who did not want to leave were welcomed to stay in the public viewing area.

14. On both November 14 and 15 there were members of the media and the public observing the Recount from a designated area. There were more people present in the public area on Saturday.

15. On Sunday, November 15, there was a press conference wherein it was announced that the County was getting close to finishing the Recount and it was going well. The County expected to be finished with the Recount by the afternoon.

16. On Sunday, November 15, I observed members of two separate voter review panels, which were adjudicating ballots containing Presidential votes. I understood that there were two Republican review panel members who had not shown up. Two credentialed Republican floor monitors were allowed to serve on the review panels. When two Republican gentlemen did show up for the review panels, the floor monitors did not want to relinquish their roles and Fulton county officials agreed to let them stay.


17. At no time did I see or hear of any counting errors. The process appeared to be running smoothly.

18. On Sunday, November 15, I left around 12:30 p.m., after approximately 4 hours of observation. I left the Recount because the review panels I had been watching were essentially done.

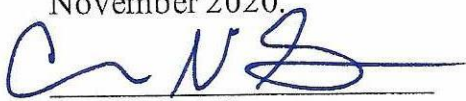
19. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

20. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 18th day of November 2020.

 (signed)
Robin Lourie

Sworn to and subscribed to
before me this 18th day of
November 2020.


Notary Public

My commission expires:
10/24/2023

